

Andrew S. Feldman

Feldman Firm, PLLC Southeast Financial Center 200 S. Biscayne Blvd, Suite 2770

Miami, Florida 33131 Phone: 305.714.9474 Mobile: 202.320.7705

Email: <u>afeldman@feldmanpllc.com</u>
Website: <u>www.feldmanpllc.com</u>

Florida Bar No. 60325 NY Bar Reg No: 4864799

June 17, 2020

VIA CM/ECF

Honorable Mary K. Vyskocil United States District Court Southern District of New York 500 Pearl Street, Room 18-C New York, NY 10007 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/17/2020

U.S. v. Seth Fishman, DVM, 20-cr-160-MKV (SDNY)

RE: Motion for Extension of Time to File Reply to Government's Response to Motion for Bill of Particulars by or before June 22, 2020

Dear Judge Vyskocil:

We write to you to request a brief five (5) day extension to reply to the Government's Response to Dr. Fishman's Motion for a Bill of Particulars by or before June 22, 2020. The undersigned has conferred with AUSA Andrew Adams who has no objection to this request.

On May 14, 2020, Dr. Fishman filed the Motion. ECF-202. On June 1, 2020, your Honor issued an order setting a schedule to respond to the Motion for Bill of Particulars requiring that the Government respond by June 10, 2020 and requiring that Dr. Fishman reply by June 17, 2020. ECF-207.

The undersigned needs additional time this week for three reasons. First, the undersigned has not had adequate time to respond because of care-taking responsibilities related to his 2-month old daughter. Second, the undersigned has a deadline to respond and to produce thousands of documents in an unrelated matter in another jurisdiction (outside of New York) this week. Third, the undersigned requires additional time to adequately respond to the 45-page response filed by the Government. The legal and factual issues presented by the Motion are complex and require additional time.

Honorable Mary K. Vyskocil

Page 2

For these reasons, Dr. Fishman respectfully moves your Honor to endorse this application "SO GRANTED" for an extension of time to file the Reply by or before June 22, 2020.

Sincerely,

FELDMAN FIRM, PLLC

Andrew S. Feldman

Granted. SO ORDERED.

Date: 6/17/2020

New York, New York

Mary Kay Wskocil

United States District Judge